REMARKS

This Application has been carefully reviewed in light of the Office Action electronically sent July 9, 2007. Claims 1-4, 6-16, 18-46, and 48-51 are pending in the Application and are rejected in the Office Action. For the reasons given below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and allowance of all pending claims.

Section 102 Rejections

The Office Action rejects Claims 1-4, 6-16, 18-46, and 48-51 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,711,159 issued to Grabelsky et al. ("*Grabelsky*") in view of U.S. Patent No. 4,797,915 issued to Bowker et al. ("*Bowker*").

In order to establish a *prima facie* case of obviousness, three requirements must be met: (1) there must be some suggestion or motivation, either in the references themselves or in the knowledge available to one skilled in the art, to modify a reference or combine multiple references; (2) there must be a reasonable expectation of success; and (3) the prior art reference (or combination of references) must teach or suggest all of the claim limitations. M.P.E.P. § 2143. In the present case, a *prima facie* case of obviousness cannot be maintained for at least two reasons. First, neither *Grabelsky* nor *Bowker* provides a suggestion or motivation to combine the references. Second, even assuming for the sake of argument that the references did suggest or motivate a combination of the references to a person of ordinary skill in the art at the time of the invention, *Grabelsky* and *Bowker,* whether considered singly, in combination with one another, or in combination with information generally available to those of ordinary skill in the art at the time of the invention, still fail to disclose all of the elements of the pending claims.

Independent Claim 1, as amended, recites the following limitations:

> A method for call routing, comprising:
> receiving a call request at a first call manager from a first telephony device coupled to a packet-based network, the call request including a telephone number associated with a second telephony device;

accessing a route list associated with the telephone number to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises a plurality of route groups, each route group including a list of one or more ports of a plurality of gateway devices; and

communicating the call request to a second call manager controlling the gateway device included in the route list;

wherein accessing a route list associated with the telephone number comprises:

accessing a registration information table to determine a process identification (PID) of a route list control process executed by the first call manager and associated with the telephone number; and

communicating the call request to the route list control process using the PID, the route list control process operable to access the route list.

Independent Claims 13, 33 and 44 recite similar, although not identical, limitations.

Independent Claim 1 is allowable because *Grabelsky* and *Bowker* do not disclose each and every one of these limitations. For example, the cited references do not disclose that a "route list comprises a plurality of route groups, each route group including a list of one or more ports of a plurality of gateway devices," as required by Claim 1. For a teaching of this limitation, the Office Action refers to route table 611 and line pools 621-623 of *Bowker*. However, *Bowker* discloses that its line pools consist of central office lines having a common characteristic. *See Column 5, lines 5-7.* Therefore, these line pools do not include a list of one or more ports of a plurality of gateway devices, as required by the claims. Furthermore, as noted in Applicants' previous Response, *Grabelsky* also does not disclose a route list comprising a plurality of route groups. In addition, the Examiner has not provided any specific reasoning as to how one of skill in the art would be motivated to use groupings of line pools in the invention described in *Grabelsky*. For example, Applicants respectfully submit that there is no suggestion or motivation to combine the concept of line pools in association with the MGC lists of *Grabelsky*.

Furthermore, Claim 1 has been amended to include the limitations of dependent Claim 3. *Grabelsky* and *Bowker* also do not disclose these limitations, which require that accessing a route list associated with the telephone number comprises: "accessing a

registration information table to determine a process identification (PID) of a route list control process executed by the first call manager and associated with the telephone number; and communicating the call request to the route list control process using the PID, the route list control process operable to access the route list." For a teaching of these limitations, the Office Action asserts that *Bowker's* pool access permission table discloses the recited "registration information table", that *Bowker's* pool identifier discloses the recited "process identification (PID) of a route list control process executed by the first call manager and associated with the telephone number, and that Column 3, lines 24-35, Column 5, lines 14-41, and Column 7, lines 7-31 of *Bowker* disclose the recited "communicating the call request to the route list control process using the PID, the route list control process operable to access the route list." Applicants respectfully disagree.

Bowker does not disclose any types of processes, much less a route list control process that is identified by a process identifier. The pool identifier of *Bowker* identifies a line pool, it does not identify a route list control process (it is neither (i) associated with a route list – since the Office Action states that a line pool is a route *group*, nor is it (ii) associated with any kind of *control process*). Furthermore, none of the passages cited in the rejection include any disclosure of a route list control process that is operable to access a route list, and the Office Action does not explain how the cited passages relate to these limitations.

For at least these reasons, Applicants respectfully submit that Claim 1 is in condition for allowance. Furthermore, independent Claims 13, 33, and 44 contain similar limitations and are allowable for analogous reasons. Therefore, Applicants respectfully request reconsideration and allowance of Claims 1, 13, 33, and 44, as well as those claims that depend from these independent claims.

Although Applicants believe that many of the dependent claims contain additional limitations that are not disclosed in the cited references, Applicants will specifically address the rejection of particular claims as an example. For example, regarding Claims 19 and 27-

32, these claims recite a route list control process and various limitations relating to such a route list control process. However, as discussed above, the Office Action does explain how such a process is disclosed in the cited references (much less how the specific limitations associated with this process are disclosed). Furthermore, the specific limitations of Claims 27-32, relating to a route plan and associated limitations, are not disclosed in either reference. The passages that the Office Action indicates disclose these limitations plainly do not disclose them and the Office Action provides no explanation as to how these limitations might be disclosed in the cited passages.

Furthermore, Claim 6 recites, in part, accessing a device name mapping table using the device manager to determine a PID of a first device process executed by the second call manager and controlling the gateway device. Dependent Claims 11, 18, 37, and 48 (and the claims dependent therefrom) recite similar, although not identical, limitations. The Office Action points to several passages from *Bowker*; however, the passages that the Office Action indicates disclose these limitations again plainly do not disclose these limitations and the Office Action provides no explanation as to how these limitations might be disclosed in the cited passages. Both *Bowker* and *Grabelsky* fail to disclose accessing a device mapping table to determine a process identification of a first device process executed by a second call manager, as recited in Claim 6, and similarly, although not identically, in Claims 11, 18, 37, and 48 (and the claims dependent therefrom). For at least this additional reason, Appellants respectfully request allowance of Claims 6, 11,18, 37, and 48 (and the claims dependent therefrom).

In addition, Claim 23 recites, in part, a device manager operable to receive a signal indicating that a new gateway device has registered with the call manager. Paragraph 13 of the Office Action does not mention any portion of *Grabelsky* or *Bowker* that the Examiner asserts as containing a disclosure of a device manager operable to receive a signal indicating that a new gateway device has registered with the call manager. The cited passages do not relate to this limitation. For at least this additional reason, Appellants respectfully request allowance of Claim 23.

Moreover, Claim 24 of the present invention recites:

> The call manager of Claim 18, wherein the device manager is further operable to:
> receive a signal indicating that a gateway device is no longer under the control of the call manager;
> delete the device name and associated PID of the gateway device from the device name mapping table; and
> communicate a deletion signal to the second call manager coupled to the packet-based network indicating that the device name and associated PID should be deleted from a device name mapping table of the second call manager.

Paragraph 14 of the Office Action does not mention any portion of *Grabelsky* or *Bowker* that the Examiner asserts as containing a disclosure of the above limitations. The cited passages do not relate to the limitations quoted above. For at least these additional reasons, Claim Appellants respectfully request allowance of Claim 24.

In addition, Claim 25 recites, in part, a device manager operable to receive a signal indicating that a third call manager has come on-line in the packet-based network. Paragraph 15 of the Office Action does not mention any portion of *Grabelsky* or *Bowker* that the Examiner asserts as containing a disclosure of the above limitations. The cited passages do not relate to any sort of signaling indicating a call manager has come on-line. For at least this additional reason, Appellants respectfully request allowance of Claim 25.

Also, Claim 26 recites a device manager operable to receive a signal indicating that the second call manager has gone off-line and delete the device name and associated PID of the gateway devices controlled by the second call manager. Paragraph 16 of the Office Action does not mention any portion of *Grabelsky* or *Bowker* that the Examiner asserts as containing a disclosure of the above limitations. Again, the cited passages do not relate at all to the recited limitations. For at least this additional reason, Appellants respectfully request allowance of Claim 26.
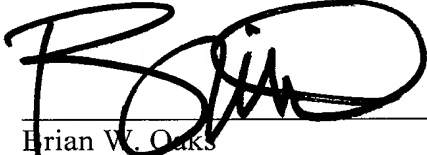
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CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brian W. Oaks, Attorney for Applicants, at the Examiner's convenience at (214) 953-6986.

Applicants believe no fee is due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayments Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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